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Mrs. Hazel E. McEwen
Executive Secretary of
Task Group 17
Office of ADP Standards
Management
National Bureau of Standards
Washington, D. C. 20234

Dear Mrs. McEwen:

Thank you for the opportunity to comment on the preliminary Task Group 17 reports titled "Guidelines for the Management of Data Resources" and "Executive Guide to the Management of Data Resources." I have been asked to represent the Agency in matters pertaining to Task Group 17 and to prepare our comments on these two preliminary reports. First, I would like to compliment Task Group 17 members on the very clear writing used in the Executive Guide. This report is easy to read and it is most interesting. It convincingly states the value of data management to managers, and does it in such a way that the manager does not have to be an expert in information systems in order to understand the important issues.

I believe that one premise upon which these reports are based should be studied again by the members of Task Group 17. This is the role that you ascribe to records management. In your reports you distinguish between reports management, forms management, and records management. You address these management functions as though they are organizationally separate. In fact, in the Federal Government, forms management and reports management are two of approximately seventeen programs that all Federal agencies should include in their records management program. I am responsible for managing one such program in CIA--the ADP Records Management Program, which is part of our Agency Records Management Program. The best people to consult on the scope of Federal records management programs are the people in the National Archives and Records Service (NARS), who by law (41 CFR 101-11), are responsible for inspecting these programs.

This leads me to an important comment I would like to make about the two Task Group 17 reports. In my work in ADP records management I receive guidelines and requirements from different Federal agencies. One such agency is NARS which provides guidelines for conducting an ADP records management program. Another is the National Bureau of Standards, which issues standards and guidelines for the management of data processing resources and, as your Task Group well knows, data is one of these resources. So I am faced with complying with guidelines and regulations issued by two agencies. This in itself is not all that bad. What is bad is that

the guidelines and regulations of one agency, NARS, never refer to the other agency, the Bureau of Standards, and the reverse is true. I think that these two organizations must get together. There has to be some coordination. When the Bureau of Standards issues a report on data resource management it must at least reference the data resource management responsibilities that are already in the Code of Federal Regulations. It should also state how the new guidelines can be incorporated into the operating environment of an on-going program.

On page 11 of the Executive Guide, the paragraph titled "Will Operating or Program Managers Have to Yield Control Over Their Data?" fails to mention the existence of a very important control procedure for records in the Federal Government. All Federal records, and that means the data contained in them, are public property. A manager of a Federal organization may direct the creation of records and certainly has something to say about how they are used. But all managers should be aware of the fact that they are not the owners of these records--the records are public property! There are control procedures imposed by law for accounting for the creation and disposition of public records. I believe that this accountability for records should somehow be mentioned in the Task Group 17 publications on data resource management.

In the Executive Guide an analogy is shown between managing records and managing data as one would manage property. This is appropriate because it is the Federal Property Management Regulations which include the management procedures that apply to Federal records. Federal records are recognized as a property resource of the Federal Government. In fact, the records management program is a resource management program, and it has a great deal of similarity with the data resource management program you are advocating in the two draft reports. The similarity is most apparent in the tasks which you define. You propose accountability for the data, so does a Records Management Officer. You are concerned with controls over the creation, maintenance, use, and disposition of data. Records Management Officers are concerned with the creation, maintenance, use, and disposition of records. The Task Group 17 guidelines advocate the use of a data resource directory as an inventory of data within an organization. The Records Control Schedules used in Federal agencies can be a good start for compiling such a directory. If the directory is to be compiled in a hierarchical fashion, then the Records Control Schedules could be the highest level of that directory. It already specifies the broad categories for records that exist. Does this comparison of tasks help explain my concern that your guidelines mention the Federal regulations that already exist for the management of records?

The Executive Guide states on page 15 that records management is an operational activity, whereas data resource management is not. In our agency, records management is an operational activity but it is also a management activity in the sense that we do have an Agency Records Management Program and a component that provides records management guidelines which apply throughout the Agency.

I do not want to end these comments on a critical note. I believe that the work you are doing is most important and could contribute to a rousing of management interest in records management, and I will be happy to help Task Group 17 in any way I can. My phone number is [REDACTED] Please send any correspondence to me c/o Central Intelligence Agency, Washington, D. C. 20505. STATINTL

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cc: Archivist of the United States

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